

MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT
TITLE V OPERATING PERMIT

24580 Silver Cloud Court
Monterey, CA 93940
Telephone: (831) 647-9411

ISSUED TO:

Mobil Oil Corporation
3700 West 190th Street, TPT-3
Torrance, CA 90509

PLANT SITE LOCATION:

Sargent Canyon Road
San Ardo, California

ISSUED BY:

Douglas Quetin, Air Pollution Control Officer

Date

Nature of Business: Petroleum Storage and Transfer

SIC Codes: 5171 - Petroleum Bulk Stations and Terminals

RESPONSIBLE OFFICIAL:

Name: Mr. F. L. Anderson
Title: Northern Assets Manager
Phone: (661) 763-7602

FACILITY CONTACT PERSON:

Name: Mr. L. P. Cerda
Title: Unit Train Coordinator
Phone: (831) 627-2393

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FACILITY DESCRIPTION

Mobil Oil Corporation operates a petroleum storage and transfer facility in the San Ardo Oil field in Southern Monterey County. The facility purchases crude oil from the field producers. The crude is stored in storage tanks until it is loaded into rail cars or tanker trucks via loading systems.

The Mobil Oil Corporation San Ardo Station is considered a federal Major Source and subject to the Title V permitting program due to the potential to emit Volatile Organic Compounds (VOC).

EQUIPMENT DESCRIPTION

PETROLEUM STORAGE AND TRANSFER FACILITY CONSISTING OF:

1. Storage Tanks

Fixed Roof Tank, 48' Diameter x 40' Height, 15,000 Barrel Nominal Capacity.

Fixed Roof Tank, 115' Diameter x 29' Height, 55,000 Barrel Nominal Capacity.

Fixed Roof Tank, 114' Diameter x 30' Height, 55,000 Barrel Nominal Capacity.

Fixed Roof Tank, 100' Diameter x 38' Height, 55,000 Barrel Nominal Capacity.

2. Crude Oil Heaters

Three Crude Oil Heaters, Natural Gas Fired With Fuel Oil Standby, Each Rated At 7.2 MMBtu/Hr Maximum Heat Input.

3. Bulk Tank Car Loading System With Thermal Oxidizer

Tank Car Articulated Loading Booms Capable Of Simultaneously Filling Six Sets Of Tank Cars, With All Tank Cars Interconnected To The Vapor Recovery System.

Vapor Recovery System With Nitrogen Purging, Automated Control Valves, And Vapor Collection/Overfill Hoses Vented Directly To Liquid Knockout Tanks.

Two Liquid Knockout Tanks, Each With 10,000 Gallon Capacity.

Thermal Oxidizer, Burner Rated At 10 MMBtu/Hr For Natural And Waste Gas.

4. Truck Unloading/Loading System

5. Ancillary Equipment

Diesel Fired Emergency Water Pump.

Gasoline Fired Emergency Water Pump.

Laboratory Fume Hood.

FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS

1. Mobil Oil Corporation shall operate the Vapor Recovery System and Thermal Oxidizer whenever railcars are being loaded. [District Rule 207]
2. Mobil Oil Corporation shall ensure that all tank car hatches are closed and sealed during loading operations to prevent fugitive emission losses. [District Rule 207]
3. Mobil Oil Corporation shall operate the Thermal Oxidizer at a minimum combustion temperature of 1000 °F during any period of time that the vapor recovery system is providing waste gas to the thermal oxidizer. [District Rule 207]
4. Mobil Oil Corporation shall operate and maintain the Thermal Oxidizer such that the minimum overall hydrocarbon destruction efficiency is 98 percent. [District Rule 207]
5. No air contaminant shall be discharged into the atmosphere for any period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than Ringelmann 1 or equivalent 20% opacity. [District Rule 400]
6. Particulate matter shall not exceed 0.15 grains per standard dry cubic foot in any exhaust stream. [District Rule 403]
7. Sulfur compounds calculated as sulfur dioxide (SO₂) shall not exceed 0.2 percent by volume in the exhaust streams from the Crude Oil Heaters, the Thermal Oxidizer, or the Emergency Diesel Engine. [District Rule 404]
8. Oxides of Nitrogen, calculated as nitrogen dioxide (NO₂), from the Crude Oil Heaters, the Thermal Oxidizer, or the Emergency Engines shall not exceed 140 lbs/hr. [District Rule 404]

9. The sulfur content on any fuel oil used at the facility shall not exceed 0.5 percent by weight. [District Rule 412]
10. The sulfur content on any gaseous fuel used at the facility shall not contain sulfur compounds, calculated as hydrogen sulfide at standard conditions, in excess of 50 grains per 100 cubic feet. [District Rule 412]
11. No more than 40 pounds per day, nor more than 8 pounds per hour of photochemically reactive solvent containing materials, as defined in District Rule 416, shall be discharged from any individual operation at the facility that uses or applies photochemically reactive solvent containing material. [District Rule 416]
12. No more than 3,000 pounds per day, nor more than 450 pounds per hour of non-photochemically reactive solvent containing materials, as defined in District Rule 416, shall be discharged from any individual operation at the facility that uses or applies non-photochemically reactive solvent containing material. [District Rule 416]
13. Mobil Oil Corporation shall store no organic material in the Storage Tanks with a vapor pressure equal to or greater than 1.5 psi under storage conditions until such time that the tanks are equipped with a vapor loss control device. [District Rule 417]
14. Mobil Oil Corporation shall limit emissions of volatile organic compounds from the use of architectural coatings pursuant to the requirements of District Rule 426. [District Rule 426]
15. Should the facility, as defined in 40 CFR §68.3 become subject to Part 68, then Mobil Oil Corporation shall submit a risk management plan (RMP) by the date specified in 40 CFR §68.10. Once subject to Part 68, Mobil Oil Corporation shall certify compliance with these requirements as part of the annual compliance certification required by 40 CFR Part 70 and this permit. [40 CFR Part 68]
16. Mobil Oil Corporation shall comply with the requirements of 40 CFR Part 82 - Protection of Stratospheric Ozone. [40 CFR Part 82]

TESTING REQUIREMENTS AND PROCEDURES

17. Mobil Oil Corporation shall conduct annual performance tests of the vapor control system during the fourth quarter of each year, in accordance with Monterey Bay Unified Air Pollution Control District test procedures. The written results of such performance tests shall be furnished no later than thirty (30) days of the test completion. [District Rule 207]

Test protocols shall be submitted to the District no later than thirty (30) days prior to the performance tests, and written notice shall be provided to the District a minimum of seven (7) days prior to the actual date of the approved testing so that a District observer can be present.

The performance tests shall include, but will not be limited to, the determination of the following parameters:

- a) Oxides of Nitrogen as NO₂: lb/MMBtu, lb/MMcf, ppm, and lb_m/hr.
- b) Carbon Monoxide: lb/MMBtu, lb/MMcf, ppm, and lb_m/hr.
- c) Inlet and outlet total and Non-methane hydrocarbons.
- d) Total and Non-methane hydrocarbon destruction efficiency.

and the following process parameters:

- e) Total natural gas consumed.
- f) Exhaust gas temperature.
- g) Exhaust gas flow rate in SDCFM.
- h) Residence time.

- 18. No testing is specified for the generic (Rule 400) opacity requirement from condition number 5 while firing on gaseous fuels. When a specific Crude Oil Heater or Emergency Diesel Engine has been fired with fuel oil continuously for a period of 120 hours, Mobil Oil Corporation shall conduct testing in accordance with the methodology contained in EPA Method 9. The testing shall occur at fourteen day intervals after the initial 120 hours. The averaging/aggregating period contained in District Rule 400 shall be used to verify compliance with condition number 5. [District Rule 218]
- 19. No testing is specified for the (Rule 403) particulate matter emission standard from condition number 6. The fuel burning equipment is assumed to be in compliance with the particulate matter emission standard based upon the engineering calculations contained in the evaluation report. If testing is conducted for condition number 6, Mobil Oil Corporation should conduct testing in accordance with the methodology contained in EPA Method 5. [District Rule 218]
- 20. No testing is specified for the (Rule 404) sulfur concentration limit in condition number 7. The fuel burning equipment is assumed to be in compliance with this sulfur concentration limit based upon the engineering calculations contained in the evaluation report. If testing is conducted for condition number 7, Mobil Oil Corporation should conduct testing in accordance with the methodology contained in EPA Method 6 or CARB Method 100. [District Rule 218]
- 21. No testing is specified for the (Rule 404) NO_x (oxides of nitrogen) limit in condition number 8. The fuel burning equipment is assumed to be in compliance with these NO_x limits based upon the engineering calculations contained in the evaluation report. If testing is conducted for condition number 8, Mobil Oil Corporation should conduct testing in accordance with the methodology contained in EPA Method 7 or CARB Method 100. [District Rule 218]

22. Testing of all fuel oil (for combustion) delivered to the facility shall be conducted prior to or upon receipt of the fuel, or in lieu of testing a manufacturers certification of the sulfur content of the fuel oil shall be supplied at the time of delivery. Mobil Oil Corporation shall conduct testing in accordance with ASTM D1552-83, ASTM D1266-87 or ASTM D2622-87 or shall receive certification as to the sulfur content of the fuel from the manufacturer to verify compliance with condition number 9. [District Rule 218]
23. No testing is specified for the sulfur content of gaseous fuels as long as the only gaseous fuel fired is pipeline quality natural gas. If the facility fires other gaseous fuels, Mobil Oil Corporation shall maintain fuel sulfur content reports to be provided by the fuel supplier or shall conduct testing of all gaseous fuel deliveries in accordance with ASTM D 1072-80, ASTM D 3031-81, ASTM D 3246-81 or SCAQMD Method 307-91 to verify compliance with Condition 10. [District Rule 218]
24. Mobil Oil Corporation shall conduct testing in accordance with ASTM D 323 on an annual basis to determine the Reid vapor pressure which should then be corrected to the true vapor pressure of the crude oil at the actual storage conditions (temperature) in the Storage Tanks to verify compliance with Condition 13. [District Rule 218]

MONITORING AND RECORD KEEPING REQUIREMENTS

- 25) Mobil Oil Corporation shall maintain records on the annual amount of crude oil loaded into tank cars, natural gas consumption, and total hours of Thermal Oxidizer operation. [District Rule 207]
- 26) Mobil Oil Corporation shall operate instrumentation that continuously records the combustion temperature during Thermal Oxidizer operation. [District Rule 207]
- 27) Mobil Oil Corporation shall maintain a daily log which records the amount and type of solvent containing material consumed in the Laboratory Fume Hood to verify compliance with the usage limits specified in conditions 11 and 12. [District Rule 416]
- 28) As applicable Mobil Oil Corporation shall maintain the following general records of required monitoring information [District Rule 218]:
 - a) the date and time of sampling or measurements;
 - b) the date(s) analyses were performed;
 - c) the company or entity that performed the analyses;
 - d) the analytical techniques or methods used;
 - e) the results of such analyses; and
 - f) the operating conditions existing at the time of sampling or measurement.

29. Mobil Oil Corporation shall maintain records on the occurrence and duration of any startup or shutdown resulting from a malfunction in the operation of the control equipment under this permit. [District Rule 218]
30. Mobil Oil Corporation shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [District Rule 218]

REPORTING REQUIREMENTS

31. Mobil Oil Corporation shall report all breakdowns which results in the inability to comply with any emission standard or requirement contained on this permit to the Air Pollution Control Officer (APCO) within 1 hour of the occurrence, this one hour period may be extended up to six hours for good cause by the APCO. The APCO may elect to take no enforcement action if Mobil Oil Corporation demonstrates to the APCO's satisfaction that a breakdown condition exists.

The estimated time for repair of the breakdown shall be supplied to the APCO within 24 hours of the occurrence and a written report shall be supplied to the APCO with 5 days after the occurrence has been corrected. This report shall include at a minimum [District Rule 214]:

- a) a statement that the condition or failure has been corrected and the date of correction; and
 - b) a description of the reasons for the occurrence; and
 - c) a description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future; and
 - d) an estimate of the emissions caused by the condition or failure.
32. Mobil Oil Corporation shall submit semiannual monitoring reports to the District, in a District approved format, no later than August 15 for the period of January 1 through June 30 and no later than February 15 for the period of July 1 through December 31. [District Rule 218]

These monitoring reports shall include at a minimum:

- a) the time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions and preventative measures adopted; and
 - b) the averaging period used for data reporting corresponding to the averaging

period specified in the emission test period used to determine compliance with an emission standard for the pollutant in question; and

- c) all information pertaining to any monitoring as required by the permit; and
- d) a negative declaration specifying when no excess emissions occurred.

33. Mobil Oil Corporation shall submit an annual compliance certification report to the District and U.S. EPA, in a District approved format, no later than February 15 for the period of January 1 through December 31 of the preceding year. [District Rule 218]

This report shall include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report and shall include at a minimum:

- a) identification of each term or condition of the permit that is the basis of the certification; and
- b) the compliance status; and
- c) whether compliance was continuous or intermittent; and
- d) the method(s) used for determining the compliance status of the source, currently and over the reporting period.

GENERAL CONDITIONS

34. Mobil Oil Corporation shall comply with all conditions of this federal operating permit. Any noncompliance with a permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [District Rule 218]
35. In an enforcement action, the fact that Mobil Oil Corporation would have to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit is not a defense. [District Rule 218]
36. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District. The filing of a request by Mobil Oil Corporation for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 218]
37. This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of

personal rights, nor any infringement of federal, state, or local laws or regulations. [District Rule 218]

38. Mobil Oil Corporation shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, Mobil Oil Corporation shall also furnish to the District copies of records required to be retained by this permit. [District Rule 218]
39. For applicable requirements that will become effective during the permit term, Mobil Oil Corporation shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [District Rule 218]
40. Any document submitted to the District pursuant to this permit shall contain certification by the responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Mobil Oil Corporation shall promptly, upon discovery, report to the District a material error or omission in these records, reports, plans, or other documents. [District Rule 218]
41. Mobil Oil Corporation shall report any violation of any requirement contained in this permit to the District within 96 hours after such occurrence. The violation report shall include the time intervals, date and magnitude of excess emissions; nature and cause of the excess (if known), corrective actions and preventive measures adopted. [District Rule 218]
42. Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, record keeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with. [District Rule 218]
43. For this federal operating permit to remain valid through the permit term of five years from the date of issuance, Mobil Oil Corporation shall pay an annual emission fee based upon the requirements of District Rule 308. [District Rule 218]
44. Mobil Oil Corporation shall have available at the facility at all times a copy of this federal operating permit. [District Rule 218]
45. For protection from enforcement action based upon an emergency, as defined in District Rule 218, the responsible official for Mobil Oil Corporation shall submit to the District relevant evidence which demonstrates [District Rule 218]:
 - a) an emergency occurred; and

- b) that Mobil Oil Corporation can identify the cause(s) of the emergency; and
- c) that the facility was being properly operated at the time of the emergency; and
- d) that all steps were taken to minimize the emissions resulting from the emergency; and
- e) within two working days of the emergency event, Mobil Oil Corporation provided the District with a description of the emergency and any mitigating or corrective actions taken.

46. Upon presentation of credentials, Mobil Oil Corporation shall allow the District, the ARB, the EPA, or an authorized representative, to perform the following [District Rule 218]:

- a) enter upon the premises where the federal operating permit source is located or in which any records are required to be kept under the terms and conditions of this federal operating permit;
- b) to have access to and copy any records required to be kept under the terms and conditions of this federal operating permit;
- c) to inspect any equipment, operation, or process described or required in this federal operating permit; and,
- d) to sample emissions from the source.
